

STATE OF ILLINOIS



ILLINOIS COMMERCE COMMISSION

Office of General Counsel

January 27, 2004

VIA E-Mail

Louise A. Sunderland, Esq.
SBC Illinois
225 W. Randolph Street
Floor 25D
Chicago, IL 60606

Re: Docket No. 02-0864

Dear Counsel:

Enclosed please find Staff Data Request QL 4.01 through 4.19 Revised to ILLINOIS BELL TELEPHONE COMPANY D/B/A SBC ILLINOIS (the "Company") regarding the above-referenced docket. Please provide the responses of the Company to Staff's data requests on or before February 9, 2004.

If you have any questions regarding this request, please feel free to call me at (312) 814-2865.

Sincerely,

Carmen L. Fosco

CLF

Enclosure

cc: Service List (Parties Only)
Ill. C.C. Docket 02-0864 (via e-mail or regular mail)

02-0864
TDS Cross 35
Liu
3.17.04 CLC

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Bell Telephone Company	:	
	:	
Filing to increase Unbundled Loop	:	02-0864
and Nonrecurring Rates	:	

**STAFF DATA REQUESTS QL 4.01 THROUGH 4.19 Revised
TO ILLINOIS BELL TELEPHONE COMPANY D/B/A SBC ILLINOIS**

Staff of the Illinois Commerce Commission ("Staff") hereby submits Staff Data Requests QL 4.01 through 4.19 to ILLINOIS BELL TELEPHONE COMPANY D/B/A SBC ILLINOIS (the "Company"). Responses should be delivered on or before February 9, 2004 ("Response Due Date"), in accordance with the instructions set forth below.

DEFINITIONS AND INSTRUCTIONS

1. "Relate to" or "refer to" shall mean, in addition to their customary and usual meaning, to reflect on, to pertain to, support, evidence, constitute, or mention.
2. "And" as well as "or " are to be construed either disjunctively or conjunctively so as to bring within the scope of this request any matters that might be construed outside its scope.
3. The terms "document" or "documents" are intended to be comprehensive, including without limitation any kind of written or graphic material, whether typed, handwritten, printed, computer-generated, or matter of any kind from which information can be derived, however produced, reproduced or stored on paper, cards, machines, tapes, film, electronic facsimile, disks, computer tapes, printouts, computer programs or

computer storage devices or any other medium, of any nature whatsoever, including all originals, copies and drafts.

4. When asked to "identify" a person, provide that person's name, job title and last known business address.

5. All documents requested herein are all those in the custody of, possession of, or control of the Company or its experts, consultants, agents, employees or representatives (including attorneys), or to which the Company or its experts, consultants, agents, employees or representatives (including attorneys) have access.

6. If any of the information requested in a data request cannot be furnished, please indicate what information is not being provided and the reason that it cannot be provided.

7. If the Company asserts any privilege as to any documents responsive to this request, it shall identify the author(s) of the document, the addressee(s), the recipients(s) of copies, the date of the document, the nature of the document (e.g., letter, memorandum, handwritten notes), the length of the document, the document's current location, and the specific reason(s) why the Company contends that the document is privileged or otherwise protected from discovery.

8. The response to each data request question should begin on a new page. As part of each response, please identify the data request question to which the response is made by typing it at the top of the page. In addition, provide the name, job title and phone number of the person or persons responsible for providing the information requested for each data request question.

9. Documents provided as part of a response should be attached to the sheet containing the response. Each page of all documents provided in response to any data request question should be clearly marked with the data request question number, unless stapled together, in which case only the first page need be marked.

10. Please provide individual responses as they become available. If, in your responses to a data request, you make reference to written testimony or affidavits filed in this docket, please include page numbers and line numbers where the information sought by Staff in each question can be found. Your cooperation is greatly appreciated.

11. Responses shall be provided in both paper and electronic format. Paper responses may be delivered via Regular U.S. Mail if an electronic version of the response has been already provided. Electronic versions of each response shall be provided in the same format as the original document (e.g., Microsoft Word for Windows, Microsoft Excel for Windows, etc.). To the extent possible, electronic responses shall also be provided in Adobe Acrobat PDF format. Responses shall be provided on or before the Response Due Date as follows:

Provide responses in electronic format to the following persons:

Jim Zolnierek
Illinois Commerce Commission
527 East Capitol Avenue
P.O. Box 19280
Springfield IL 62794-9280
E-mail: jzolnier@icc.state.il.us

Qin Liu
Illinois Commerce Commission
527 East Capitol Avenue
P.O. Box 19280
Springfield IL 62794-9280
E-mail: qliu@icc.state.il.us

Carmen L. Fosco
Office of General Counsel
Illinois Commerce Commission
160 North LaSalle, Suite C-800
Chicago IL 60601-3104
E-mail: cfosco@icc.state.il.us

Michael J. Lannon
Office of General Counsel
Illinois Commerce Commission
160 North LaSalle, Suite C-800
Chicago IL 60601-3104
E-mail: mlannon@icc.state.il.us

Matthew L. Harvey
Office of General Counsel
Illinois Commerce Commission
160 North LaSalle, Suite C-800
Chicago IL 60601-3104
E-mail: mharvey@icc.state.il.us

Provide paper responses to the following person:

Sheila Vance
Illinois Commerce Commission
527 East Capitol Avenue
P.O. Box 19280
Springfield IL 62794-9280

12. Staff requests that a verification or signature of an official or counsel for the Company be included with the answers to this Data Request as an indication of the genuineness and completeness of the responses and documents provided.

DATA REQUESTS

QL 4.01 Please provide the following information regarding SBC feeder network usage and feeder network capacity at Access Area level for each of the most recent five years:

- (a) (1) The total actual usage of copper feeder.
- (2) The total network copper feeder capacity.

- (b) (1) The total actual usage of fiber feeder.
- (2) The total network fiber feeder capacity.

QL 4.02 Please provide the following information regarding SBC feeder network usage and feeder network capacity for each of the most recent five years and for each of SBC central offices (i.e., at CO level):

- (a) (1) The total actual usage of copper feeder.
- (2) The total network copper feeder capacity.
- (b) (1) The total actual usage of fiber feeder.
- (2) The total network fiber feeder capacity.

QL 4.03 Please first identify the 5 central offices in each Access Area (3 in Access Area A) that have the lowest copper feeder fill rates among all central offices in the most recent year and provide the following information for each of the 5 (or 3) central offices:

- (a) Please provide the total number of copper feeder routes in these 5 (or 3) central offices.
- (b) Please provide (1) the actual usage and (2) total capacity for the 10 copper feeder routes in these 5 (or 3) central offices that have the lowest fill rates.
- (c) Please provide (1) the actual usage and (2) total capacity for the 10 copper feeder routes from the feeder routes in these 5 (or 3) central offices that have the highest fill rates.
- (d) Please provide the (1) combined actual usage and (2) combined capacity for all the copper feeder routes in these 5 (or 3) central offices.

QL 4.04 Please first identify the 5 central offices in each Access Area (3 in Access Area A) that have the lowest fiber feeder fill rates among all central offices in the most recent year and provide the following information for each of the 5 (or 3) central offices:

- (a) Please provide the total number of fiber feeder routes in these 5 (or 3) central offices.
- (b) Please provide the (1) actual usage and (2) total capacity for the 10 fiber feeder routes from the fiber feeder routes in these 5 (or 3) central offices that have the lowest fill rates.

- (c) Please provide (1) the actual usage and (2) total capacity for the 10 fiber feeder routes from the fiber feeder routes in these 5 (or 3) central offices that have the highest fill rates.
- (d) Please provide the (1) combined actual usage and (2) combined capacity for all the fiber feeder routes in these 5 (or 3) central offices.

QL 4.05 Please first identify the 5 central offices in each Access Area (3 in Access Area A) that have the highest copper feeder fill rates among all central offices in the most recent year and provide the following information for each of the 5 (or 3) central offices:

- (a) Please provide the total number of copper feeder routes in these 5 (or 3) central offices.
- (b) Please provide the (1) actual usage and (2) total capacity for the 10 copper feeder routes from the copper feeder routes in these 5 (or 3) central offices that have the lowest fill rates.
- (c) Please provide the (1) actual usage and (2) total capacity for the 10 copper feeder routes from the copper feeder routes in these 5 (or 3) central offices that have the highest fill rates.
- (d) Please provide the (1) combined actual usage and (2) combined capacity for all the copper feeder routes in these 5 (or 3) central offices.

QL 4.06 Please first identify the 5 central offices in each Access Area (3 in Access Area A) that have the highest fiber feeder fill rates among all central offices in the most recent year and provide the following information for each of the 5 (or 3) central offices:

- (a) Please provide the total number of fiber feeder routes in these 5 (or 3) central offices.
- (b) Please provide the (1) actual usage and (2) total capacity for the 10 fiber feeder routes from the fiber feeder routes in these 5 (or 3) central offices that have the lowest fill rates.
- (c) Please provide the (1) actual usage and (2) total capacity for the 10 fiber feeder routes from the fiber feeder routes in these 5 (or 3) central offices that have the highest fill rates.
- (d) Please provide the (1) combined actual usage and (2) combined capacity for all the fiber feeder routes in these 5 (or 3) central offices.

QL 4.07 Please describe SBC Engineering Guideline regarding feeder plant.

Specifically,

- (a) Does SBC engineering feeder plant conduits to meet the ultimate demand as it does with distribution plant? If so, how does SBC determine the "ultimate" demand for feeder conduits?
- (b) Does SBC also place sufficient feeder cables (conduits) to meet the "ultimate demand"?
 - 1. If the answer to (a) is "yes" and the answer to (b) is "no" (i.e., SBC does size its feeder plant conduits to meet the "ultimate demand" but does not place feeder cable to meet the "ultimate demand"), please describe how does SBC determine how much feeder plant to place in feeder conduits. That is, does SBC place sufficient feeder cables in conduits to meet demand in the next five years or in the next 10 years?

QL 4.08 Please indicate, for each of the SBC central offices identified under QL 4.03 and QL 4.04, whether SBC has done any plant-relief project for feeder in the most recent five years. For those of the SBC central offices that SBC has done plant-relief projects for feeder in the most recent five years:

- (a) Please indicate the completion date for the plant-relief projects.
- (b) Please provide (1) the actual usage and (2) the fiber or copper feeder route capacity before the plant-relief project for each of the feeder routes that were subject to "plant-relief" (please indicate if the route is fiber feeder or copper feeder).
- (c) Please provide (1) the actual usage and (2) the feeder capacity at the CO level before the plant-relief project for each of the central offices that were subject "plant-relief" (i.e., some of its feeder routes were subject to "plant-relief") for copper feeder and fiber feeder, respectively.
 - 1.

QL 4.09 Please provide the following information regarding each of SBC's 10 most recent new construction projects (not plant relief) for feeder plant.

- (a) The projection completion date for each of the feeder routes constructed.
- (b) The engineered feeder capacity, and the actual feeder capacity placed for each of the feeder routes constructed.

Note: the above question allows engineered capacity and actual capacity to be different. While the engineered capacity may be 520 copper pairs, the available copper cables are either sized at 500 or 600 and thus the actual capacity placed may differ from the engineered capacity.

- (c) Please also provide the actual usage for each of these most recently constructed feeder routes based on the most recent measurement.

QL 4.10 Please provide the following information regarding SBC distribution network usage and distribution network capacity at Access Area level for each of the most recent five years:

- (a) The total actual usage of the distribution network.
- (b) The total network distribution capacity.

QL 4.11 Please provide the following information regarding SBC distribution network usage and distribution network capacity by Central Office (i.e., at CO level) for each of the most recent five years:

- (a) The total actual distribution usage for each of SBC central office.
- (b) The total network distribution capacity for each of SBC central office.

QL 4.12 Please first identify the 5 central offices in each Access Area (3 in Access Area A) that have the lowest distribution fill rates among all central offices in the most recent year and provide the following information for each of the 5 (or 3) central offices.

For the following questions, "serving area" refers to the area that is served from one FDI.

- (a) Please provide the total number of distribution "serving areas" in these 5 (or 3) central offices.
- (b) Please provide the (1) actual usage and (2) total capacity for each of the 10 "serving areas" among the "serving areas" in these 5 (or 3) central offices that have the lowest fill rates.
- (c) Please provide the (1) actual usage and (2) total capacity for the 10 "serving areas" among the "serving areas" in these 5 (or 3) central offices that have the highest fill rates.
- (d) Please provide the (1) combined actual usage and (2) combined capacity for all serving areas in these selected 5 (or 3) central offices.

QL 4.13 Please first identify the 5 central offices in each Access Area (3 in Access Area A) that have the highest distribution fill rates among all central offices in the most recent year and provide the following information for each of the 5 (or 3) central offices.

For the following questions, "serving area" refers to the area that is served from one FDI.

- (a) Please provide the total number of distribution "serving areas" in these 5 (or 3) central offices.
- (b) Please provide the (1) actual usage and (2) total capacity for each of the 10 "serving areas" among the "serving areas" in these 5 (or 3) central offices that have the lowest fill rates.
- (c) Please provide the (1) actual usage and (2) total capacity for the 10 "serving areas" among the "serving areas" in these 5 (or 3) central offices that have the highest fill rates.
- (d) Please provide the (1) combined actual usage and (2) combined capacity for all serving areas in these 5 (or 3) central offices.

QL 4.14 Please describe SBC's Engineering Guideline regarding distribution plant. Specifically,

- (a) Does SBC size its distribution based on 2.25 lines per living units for single-dwelling area?
- (b) Does SBC apply the same engineering guideline (i.e., 2.25 line per "living unit") to multi-dwelling units area (such as apartment complex)? If not, what is the engineering guideline regarding sizing distribution for, say, apartment complex?
- (c) Does SBC apply the same engineering guideline (i.e., 2.25 lines per "living unit") to business buildings? If not, what is the engineering guideline regarding sizing distribution for, say, business buildings?

QL 4.15 Please indicate, for each of the 5 (or 3) SBC central offices identified under QL 4.13, whether SBC has done any plant-relief project for any serving areas in the most recent five years. For those of the 5 (or 3) SBC central offices that SBC has done plant-relief projects for some serving areas in the most recent five years:

For the following questions, "serving area" refers to the area that is served from one FDI.

- (a) Please indicate the completion date for the plant-relief projects.

- (b) Please provide (1) the actual usage and (2) the capacity before plant relief for each of the serving areas that were subject to "plant-relief".
- (c) Please provide (1) the actual usage and (2) the capacity before plant relief at the CO level for each of the central offices that were subject "plant-relief" (i.e., some of its serving areas were subject to "plant-relief").

QL 4.16 Please provide the following information regarding each of SBC's 10 most recent new construction projects (not plant relief) for distribution plant.

- (a) The projection completion date for each of the distribution construction projects.
- (b) The engineered distribution capacity, and the actual distribution capacity placed for each of the distribution section constructed.

Note: the above question allows engineered capacity and actual capacity to be different. While the engineered capacity may be 520 copper pairs, the available copper cables are either sized at 500 or 600 and thus the actual capacity placed may differ from the engineered capacity.

- (c) Please also provide the actual usage for each of these most recently constructed distribution sections based on the most recent measurement.

QL 4.17 Please provide information on the following questions regarding DLC plug-in units in SBC's network for each access area, respectively.

- (a)
 - (1) The total numbers of DLC plug-in units that are in services in each of SBC's three Access Areas, respectively.
 - (2) The total numbers of DLC plug-in units installed in each of SBC's three Access Areas, respectively.
- (b) Please identify the 5 central offices in each Access Area (3 in Access Area A) that have the lowest fill rates for DLC plug-in units, and please also provide the following information:
 - (1) The total numbers of DLC plug-in units that are in service in these 5 (or 3) SBC central offices

- (2) The total numbers of DLC plug-in units that are installed in these 5 (or 3) SBC central offices.
- (c) Please identify the 5 central offices in each Access Area (3 in Access Area A) that have the highest fill rates for DLC plug-in units, and please also provide the following information:
 - (1) The total numbers of DLC plug-in units that are in service in these 5 (or 3) SBC central offices.
 - (2) The total numbers of DLC plug-in units that are installed in these 5 (or 3) SBC central offices.

QL 4.18 Please answer the following questions related to network capacity used for Maintenance, Testing and Administrative (MTA) purposes.

As used in the following questions, "working capacity" means the capacity that is being used to provide service to end-users.

- (a) Does the MTA capacity vary with the total network size for a given working capacity?
- (b) Does the MTA capacity vary with the "working capacity" for a given network size? Or,
- (c) Is the MTA capacity simply constant as a percentage of the total network capacity? That is, if the total network capacity is 1000, the MTA capacity is 20, regardless the quantity of working capacity.

QL 4.19 The following questions are related to costs associated with network maintenance and administrative costs.

- (a) Does the total Maintenance & Administrative costs per working capacity vary with the total "working" capacity for given network capacity?
- (b) Does the total Maintenance & Administrative costs per working capacity vary with the total network capacity for given level of the total "working" capacity? Or
- (c) Does the total Maintenance & Administrative costs per working capacity simply vary with the actual network fill? That is, if the working capacity and network capacity increase proportionately, the total Maintenance & Administrative costs per working capacity would stay the same.

Respectfully submitted,

Illinois Commerce Commission Staff

By: /s/Carmen L. Fosco
One of its attorneys

Carmen L. Fosco
Matthew L. Harvey
Michael J. Lannon
Illinois Commerce Commission
Office of General Counsel
160 North LaSalle Street
Suite C-800
Chicago, Illinois 60601
(312) 793-2877
(312) 793-1556 (Fax)

Counsel for Staff of the
Illinois Commerce Commission

Date: January 27, 2004

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused copies of the foregoing document to be served upon the persons on the attached service list by e-mail or by first class mail, proper postage prepaid, from Chicago, Illinois on January 27, 2004.

/s/

Carmen L. Fosco